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July 28, 2022

VIA ECF

The Honorable Victor Marrero
United States District Court Judge
United States District Court
500 Pearl Street, Suite 1610
New York, New York 10007

Re: Nwosuocha v. Glover, et al. (Civ. Action No. 21-cv-04047)

Dear Judge Marrero:

We are the attorneys for Defendant Donald McKinley Glover, II in the above-referenced action. We submit this letter on behalf of all Defendants, which comprise Defendants Glover, Ludwig Emil Tomas Göransson, Jeffery Lamar Williams, Kobalt Music Publishing America, Inc. d/b/a Songs of Kobalt Music Publishing, Sony Music Entertainment, Young Stoner Life Publishing, LLC, Theory Entertainment LLC d/b/a 300 Entertainment, Atlantic Recording Corporation, Songs of Universal, Inc., and Warner-Tamerlane Publishing Corp.

The purpose of this letter is to apprise the Court of the status of the filing of Defendants' motion to dismiss the Complaint, which is authorized under your Honor's Order, dated June 24, 2022, as modified by the Court's letter endorsement, dated July 20, 2022. [Dkts. No. 81 and 83.]

On Monday of this week, I attempted to coordinate the filing of Defendants' motion with Plaintiff's counsel to avoid any scheduling conflicts. Defendants' motion papers are completed, but as lead counsel for Defendants, I had to avoid service of Plaintiff's opposition papers while I am on vacation between August 6 through August 14. In my email communications with Plaintiff's counsel, Imran Ansari, I learned he was out of the country until August 3.

Due to his absence, I proposed to Mr. Ansari that Defendants would file their motion on Tuesday, August 9, with Plaintiff's opposition papers due Tuesday, August 16, and Defendants' reply papers due Tuesday, August 23. Mr. Ansari responded that he has multiple conflicts in August and requested that a September schedule be arranged.

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Although Mr. Ansari and I briefly communicated by email yesterday, he did not respond to the September schedule I proposed. If the Court is willing to approve a September schedule to accommodate Mr. Ansari's conflicts, Defendants propose the following schedule: Defendants will file their motion on Friday, September 9, Plaintiff's opposition will be due on Friday, September 16, and Defendants' reply will be due Friday, September 23. We will, of course, follow the Court's direction.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

JDD:hs

cc: All Counsel (Via ECF)